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*Counsel for Plaintiffs*

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE  
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.  
LUKE'S REGIONAL MEDICAL CENTER,  
LTD; CHRIS ROTH, an individual;  
NATASHA D. ERICKSON, MD, an  
individual; and TRACY W. JUNGMAN, NP,  
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON  
BUNDY FOR GOVERNOR, a political  
organization; DIEGO RODRIGUEZ, an  
individual; FREEDOM MAN PRESS LLC, a  
limited liability company; FREEDOM MAN  
PAC, a registered political action committee;  
and PEOPLE'S RIGHTS NETWORK, a  
political organization,

Defendants.

Case No. CV01-22-06789

**SUPPLEMENTAL DECLARATION OF  
ERIK F. STIDHAM IN SUPPORT OF  
MOTION FOR SANCTIONS AND  
PROTECTIVE ORDER RELATING TO  
LIMITED DEPOSITION OF DIEGO  
RODRIGUEZ SET FOR OCTOBER 5,  
2022**

Erik F. Stidham declares and states as follows:

1. I am counsel of record for Plaintiffs in this matter. I am familiar with the facts and proceedings in this matter and have personal knowledge of the matters stated in this Declaration.

SUPPLEMENTAL DECLARATION OF ERIK F. STIDHAM IN SUPPORT OF  
MOTION FOR SANCTIONS AND PROTECTIVE ORDER RELATING TO LIMITED  
DEPOSITION OF DIEGO RODRIGUEZ SET FOR OCTOBER 5, 2022 - 1

2. Attached hereto as **Exhibit A** is a true and correct copy of an email dated October 4, 2022 that Diego Rodriguez sent to an undisclosed group of followers regarding his deposition scheduled for October 5, 2022.

3. Attached hereto as **Exhibit B** is a true and correct copy of an email dated October 5, 2022 that Diego Rodriguez sent to an undisclosed group of followers regarding his deposition scheduled for October 5, 2022.

I declare under penalty of perjury under the laws of the State of Idaho that the foregoing is true and correct.

DATED this 8th day of November, 2022.

/s/ Erik F. Stidham

Erik F. Stidham

## CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of November, 2022, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor  
P.O. Box 370  
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy for Governor  
c/o Ammon Bundy  
4615 Harvest Ln.  
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
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Ammon Bundy  
4615 Harvest Ln.  
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

People's Rights Network  
c/o Ammon Bundy  
4615 Harvest Ln.  
Emmett, ID 83617-3601

- U.S. Mail
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People's Rights Network  
c/o Ammon Bundy  
P.O. Box 370  
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC  
c/o Diego Rodriguez  
1317 Edgewater Dr. #5077  
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC  
c/o Diego Rodriguez  
9169 W. State St., Ste. 3177  
Boise, ID 83714

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man PAC  
c/o Diego Rodriguez  
1317 Edgewater Dr., #5077  
Orlando, FL 32804

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- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Diego Rodriguez  
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Orlando, FL 32804

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- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:  
freedommanpress@protonmail.com

*/s/ Erik F. Stidham*

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Erik F. Stidham  
OF HOLLAND & HART LLP

20203654\_v1

**Exhibit A**

**Exhibit A**

[REDACTED]

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**From:** Diego Rodriguez <[contact@freedomman.org](mailto:contact@freedomman.org)>

**Sent:** Tuesday, October 4, 2022, 8:20 PM

**To:** [REDACTED]

**Subject:** \*\*\*DEPOSITION update\*\*\*

Friend,

Earlier this morning I sent out the following link for my deposition tomorrow morning (Wednesday, October 5th at 8:30 am Mountain Time) with Holland and Hart Law firm, who is representing St. Luke's in their lawsuit against me.

As is to be expected, they completely freaked out and panicked and tried to make up some nonsense about the "deposition being closed to the public." *For some strange reason, they are terrified about the public being able to watch and observe what they typically do behind closed doors.*

Erik Stidham, their lead lawyer, filed a bunch of documents with the court full of lies and distortions essentially saying that I called upon you to "disrupt" or "intimidate" them at the deposition. What?!?!?

Yes, this is the way people like Erik act, think, and operate. As you know, I simply invited you to ATTEND. They are not used to that. They like having all the power and control and operating in secret so they don't want you to ATTEND. But by me inviting you to ATTEND, Erik and his rainbow pals are terrified and are crying foul-play, claiming that I am inciting you to intimidate, impede, or otherwise "disrupt" the deposition.

So, at the last minute he is trying to get the court to VIOLATE YOUR CONSTITUTIONAL RIGHT to attend a public hearing. Yes, the public disclosure and accessibility of court cases is a right ensconced in the Idaho State Constitution which you can read here: <https://legislature.idaho.gov/statutesrules/idconst/ArtI/Sect18/>

It plainly states: ***Section 18. JUSTICE TO BE FREELY AND SPEEDILY ADMINISTERED. Courts of justice shall be open to every person, and a speedy remedy afforded for every injury of person, property or character, and right and justice shall be administered without sale, denial, delay, or prejudice.***

So closing off this hearing to the public is a direct violation of your Constitutional Rights. It certainly makes you wonder what he's so worried about, doesn't it? I even offered Erik the common sensical suggestion to simply MUTE all attendees if he is so concerned about disruption. Duh.

*Anyhow, I am planning on attending tomorrow, Wednesday October 5th at 8:30 am Mountain Time, via the Zoom link below. However, if Erik is successful in manipulating the courts and violating your Constitutional right to attend, he may try to switch the Zoom link. If so, I will forward the new Zoom link to you in the morning right before the deposition. If you are able to attend, I kindly ask that you just observe and demonstrate*

*your support by simply attending, and that you do not attempt to disrupt in any way. We should all behave just like we would in a physical court room (this is all obvious, but people like Erik panic unless we give these disclaimers).*

### **Deposition of Diego Rodriguez**

Time: Oct 5, 2022 08:30 AM Mountain Time (US and Canada)

<https://us02web.zoom.us/j/84012190458?pwd=UTJZVk1oNEtXZ1lhdytrRVU2ajhJdz09>

Meeting ID: 840 1219 0458

Passcode: 807207

Thanks again for your prayer and support!

Diego Rodriguez  
Freedom Man Press

## **ONE LAST THING (for those who like additional information):**

You might find it interesting that Erik today, at the last minute, filed a "MOTION FOR SANCTIONS AND PROTECTIVE ORDER RELATING TO LIMITED DEPOSITION OF DIEGO RODRIGUEZ SET FOR OCTOBER 5, 2022." Now take a look at what is says specifically:

expenditure of attorneys' fees by Plaintiffs. Among other things, Defendant F  
to his followers and the public a defamatory email containing the Zoom link t  
inciting his followers to log into the deposition for the purpose of fighting the  
who finance sexual perversion. The reckless, inflammatory language and tacti  
with Rodriguez's conduct that led to this lawsuit and continue unabated.

I find it ironic that he is complaining that I am using "reckless, inflammatory language" that "led to this lawsuit" in the first place when in reality I am simply STATING THE TRUTH AND THE FACTS—which yes, led to these criminal bullies filing the lawsuit against me. Consider these facts:

1. The Boise Gay Pride organization promotes homosexual behavior which is abhorrent and sinful. And very specifically, this year, their event in Boise included a "Drag Kids" event where they encouraged and invited minors to participate in their sexually perverted acts. A strong case could be made, based on existing Idaho Law, that this is already illegal and those who participated should be arrested and criminally charged. [Ammon Bundy posted an excellent video about this here](#). Here's the promotional material from their own brochure:



You have watched the Queens and Kings and now it is time to see the Kids. A drag show like none other the Drag Kids range from ages 11 - 18 and are ready to bring it all to the Boise Pride Festival stage! Come and cheer them on as they bring drag to the younger generation!

2. Holland and Hart Law Firm has been sponsoring Boise Pride for years. And this year, when they promoted this abhorrent and perverted “Drag Kids” event, the Holland and Hart Law Firm was a YELLOW Sponsor, which simply means they gave \$12,000 to Boise Pride. So yes, they are financing sexual perversion. You see, these are facts. I simply declared them. It is not “defamation” to publish or declare FACTS.



However, Erik does seem to be personally very supportive of Holland and Hart’s support of the gay agenda, as he has added to his signature support for “Gay Pride Month” even though that ended in June, and is proudly professing to the world that Holland and Hart is one of the best places to work for homosexuals and the sexually deviant in Idaho:

**Erik Stidham**

(he/him/his)

Partner, Holland & Hart LLP

800 W. Main Street, Suite 1750, Boise, ID 83702

T 208.383.3934 F 877.665.1698





***So for the spiritually discerning amongst you, it is obvious what type of battle we are engaged in here. Let us continue to pray and resist evil, and shine as much light on the corruption and darkness of these wicked people as we possibly can.***

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**Exhibit B**

**Exhibit B**



Redacted

@gmail.com&gt;

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**\*DEPOSITION\* LINK was canceled, here's the new one...**

1 message

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**Diego Rodriguez** <contact@freedomman.org>  
To: **Redacted** @gmail.com>

Wed, Oct 5, 2022 at 7:21 AM

**Redacted** Holland & Hart Law Firm, in an attempt to violate your Constitutional Rights has canceled the previous Zoom meeting and created a new one. I don't know what shenanigans they will try, but it appears at the minimum they are going to try to deny access to anyone not named "Diego Rodriguez." Let's see what happens...

Anyhow, if you'd like to try and join, here is the new Zoom Link:

**Topic: Deposition of Diego Rodriguez**

Time: Oct 5, 2022 08:30 AM Mountain Time (US and Canada)

<https://us02web.zoom.us/j/86512458172?pwd=TTRRMEIRN20vVm9hdIJhNUJKaHUyZz09>

Meeting ID: 865 1245 8172

Passcode: 413942

Diego Rodriguez  
Freedom Man Press

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